

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

DATE: AUG 04 1993

SUBJECT: Request for Completion of Consent Order, Docket No. V-W-92-C-145,
Schreiber/Caravan Drums Site, Detroit, Wayne County, Michigan
(Site ID #PY)

FROM: Peter Guria, On-Scene Coordinator
Emergency and Enforcement Branch - Section I

TO: File

US EPA RECORDS CENTER REGION 5



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PURPOSE

The purpose of this memorandum is to certify compliance with terms of the Administrative Order by Consent, Docket No. V-W-92-C-145, Schreiber/Caravan Drums Site, Detroit, Wayne County, Michigan.

BACKGROUND

The Schreiber/Caravan Drums site is located at 3033 Bourke Avenue, Detroit, Wayne County, Michigan. The facility is bordered to the north by Bourke Avenue and private residences, to the south by the Consolidated Rail Corporation (CONRAIL) railroad tracks, to the east by a hospital laundry facility, and to the west by an abandoned automotive spring manufacturing company.

Site history indicates that the facility was owned by the Schreiber Roofing Company as a storage facility for roofing materials and equipment from at least 1980 to November 1983. In November of 1983, Schreiber sold the facility to the Caravan Chemical Company, a manufacturer of industrial and commercial surfactants. In January 1985, the property was transferred from the Caravan Chemical Company to R.L. Enterprises, Inc. R.L. Enterprises currently uses the facility for the manufacture of industrial and commercial surfactants. R.L. Enterprises, Inc., is a corporation incorporated in the State of Michigan.

On December 9, 1991, the United States Environmental Protection Agency (U.S. EPA) On-Scene Coordinator (OSC) observed a tar boiler and several drums in various stages of deterioration in a small wooded area east of the Caravan facility. Many of the drums were lying on their sides and appeared to be leaking.

On December 19, 1991, the U.S. EPA Technical Assistance Team (TAT) and the OSC conducted a site assessment of the Caravan facility. Fourteen drums of unknown contents were observed scattered in a small wooded area (approximately 20' by 60') east of the Caravan building. The drums were found scattered near the tar boiler. Many of the drums were open and releasing their contents. Soil contamination was observed in the area of the leaking drums and under the tar boiler.

Access to the site was not completely restricted and evidence of vandalism and trespass through the south portions of the perimeter fence was observed.

Analytical results of liquid and soil samples collected from the drums and their spill areas revealed elevated levels of volatile organic compounds such as benzene, toluene, ethylbenzene, mixed xylenes, and naphthalene. Toluene, ethylbenzene, and mixed xylenes have flash points less than 140 degrees Fahrenheit, indicating the presence of ignitable hazardous waste under the Resource Conservation and Recovery Act (RCRA) of 1976. One sample revealed the presence of benzene above the Toxicity Characteristic Leachate Procedure (TCLP) regulatory limit for that compound. The analytical results from the drum samples also revealed the presence of polycyclic aromatic hydrocarbons (PAHs) such as benzo(b)fluoranthene and benzo(a)pyrene, which have been shown to cause cancer and mutations in laboratory animals.

There is a locked gate at the north end of the facility along Bourke Avenue, however, children have been observed on several occasions passing along the railroad easement adjacent to the site to reach a nearby playground and school. The high concentration of xylene (300,000 ppm), ethylbenzene (83,000 ppm), toluene (5,600 ppm), naphthalene (14,000 ppm), and other polycyclic aromatic hydrocarbons (ranging between 3,900 and 5,200 ppm) created a high exposure potential via direct contact.

On March 23, 1992, the Potentially Responsible Parties (PRPs), Schreiber Corporation and Caravan Technologies, Inc., agreed to enter into an Administrative Order by Consent (AOC) to undertake mitigative actions for the removal of identified hazardous substances present at the site.

THREAT

Conditions at the Schreiber/Caravan Drums site presented an imminent and substantial endangerment to the public health and welfare or the environment based upon factors set forth in the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), 40 CFR 300.415(b)(2). These factors included:

- a. actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances, pollutants or contaminants;
- b. hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers that may pose a threat of release;
- c. weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released;
- d. threat of fire and/or explosion; and

- e. the unavailability of other appropriate Federal or State response mechanisms to respond to the release.

COMPLIANCE WITH ORDER

The respondents to the AOC contracted Engineering Services, Inc. (ESI), of Trenton, Michigan, to perform the necessary cleanup activities. ESI developed a Work and Health and Safety Plan to address site activities. Actual on-site work was subcontracted to Marine Pollution Control (MPC) and Inland Waters (IW), both of Detroit, Michigan.

The PRPs performed the following tasks as agreed to in the AOC:

- 1) A work plan was developed and implemented that provided a concise description of the activities to be conducted to mitigate the threats posed by the site. This work plan was approved by the OSC after necessary revisions were made.
- 2) A site health and safety plan (HASP) and air monitoring program was implemented following approval by the OSC.
- 3) A total of thirteen 55-gallon drums were staged, sampled, and the contents characterized. Analytical results of the samples collected from each drum indicated that the contents of all the drums were compatible. A composite sample was developed and analyzed for disposal characterization and acceptance. Additionally, a representative sample was collected from the tar boiler for characterization of its contents.
- 4) A soil sampling program was conducted to characterize the type and extent of contamination present at the site. An area approximately 60' by 40' was identified to be contaminated with Polynuclear Aromatic (PNA) and BTEX compounds. Approximately 1,000 cubic yards of soil was excavated and transported to a local disposal facility. During the period of contaminated soil removal, 2,500 gallons of aqueous liquids were pumped from the excavation area and transported off-site for treatment and disposal.

Post-excavation sampling was conducted to verify that all identified areas of contamination had been removed to Michigan Department of Natural Resources (MDNR) Type B criteria cleanup levels. The excavation was then backfilled with clean, granular soil and brought to local grade.

- 5) All characterized soil contamination was disposed of at a RCRA/CERCLA-approved disposal facility in accordance with the U.S. EPA off-site policy.
- 6) The thirteen 55-gallon drums were transported to and disposed of at a RCRA/CERCLA-approved disposal facility in accordance with the U.S. EPA off-site policy.
- 7) The tar boiler was transported to the Schreiber Corporation facility where the contents of the boiler were removed and recycled for reuse as roofing compound.

CONCLUSION

During the period of March 30-31, 1993, the OSC, TAT, and ESI Project Manager conducted site walk throughs and determined that work had been performed in accordance with the agreed upon work plan.

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RS-1 Site and Read Files
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